UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
DEBORAH DONOGHUE and MARK RUBENSTEIN	
Plaintiffs,	JOINT STIPULATION AND [PROPOSED] ORDER
V.	
MYOVANT SCIENCES LTD.,	No. 20-cv-01807-JGK
Nominal Defendant,	
and	
ROIVANT SCIENCES LTD.,	
<i>Defendant.</i>	
WHEREAS, Plaintiffs commenced this action	by filing a complaint dated February 29,
2020 (the "Complaint") in the United States District C	Court for the Southern District of New
York;	
WHEREAS, Plaintiffs contend that they have p	properly effected service and Defendant
Roivant Sciences Ltd. ("Defendant") contends they ha	ive not;
WHEREAS, Plaintiffs have not served Defend	ant with a waiver of service form; and
WHEREAS, Plaintiffs and Defendant wish to a	agree to a reasonable schedule for
answering the Complaint or briefing any motion to dis	smiss;

IT IS HEREBY STIPULATED AND AGREED among the undersigned parties, subject

to the Court's approval, as follows:

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1. Plaintiffs shall be deemed to have sent a notice and request for waiver of service as of

the date that this Stipulation is ordered by the Court pursuant to Rule 4(d) of the

Federal Rules of Civil Procedure.

2. Defendant shall be deemed to have responded to the request and waived service as of

the date that this Stipulation is ordered by the Court and, in accordance with

paragraph (1), shall answer or move to dismiss the Complaint within sixty (60) days

of this Stipulation being entered by the Court.

3. If Defendant moves to dismiss the Complaint, Plaintiffs shall file any opposition to

Defendant's motion within sixty (60) days of Defendant's filing of its motion to

dismiss.

4. If Plaintiffs file an opposition to Defendant's motion to dismiss, Defendants shall file

any reply memorandum within thirty (30) days of Plaintiffs' opposition.

IT IS SO ORDERED.

THE HON. JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE

Dated: March \_\_\_\_\_\_, 2020 New York, New York Dated: March 17, 2020 Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2020, I electronically filed the foregoing Joint Stipulation and [Proposed] Order with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all attorneys of record.

Respectfully submitted,		
/s/ John S. Williams		
John Williams		